

**PRIVACY NOTICE****Sustainable Mobility Pilots in the Region of Päijät-Häme (KELPO)****EU's General Data Protection Regulation (2016/679),****Articles 13 and 14****Date: 28.8.2024 (a translation based on the Finnish original drafted 27.3.2024)****Updated: mm/dd/yyyy*****Why is the personal data collected? /Purpose of personal data processing***

The goal of the Sustainable Mobility Pilots in the Region of Päijät-Häme (KELPO) (ERDF) is to promote change in operating power and mode of transport in the Päijät-Häme region: 1) reduce road traffic-related emissions by promoting the introduction of new technologies in mobility and transport services, 2) support the regions systemic shift towards lower-emission/no-emission modes of movement, 3) increase business life knowledge of energy solutions and efficiency to support green transition such as electrification of freight transport in city logistics and less populated areas, 4) produce and distribute information about sustainable mobility, in order to support in updating the climate program of the city of Lahti and support the municipalities of the province in preparation and implementation of climate plans, community planning and political to support decision-making, and 5) increase residents' understanding of the effects of mobility on emissions, environment and well-being, and affect the attitudes and everyday mobility habits of the people of Päijät-Häme.

The implementers of the project are LAB University of Applied Sciences (coordinator) and the City of Lahti (partner). The project maps the most effective measures at the municipal level to promote sustainable transport, their emission reduction effects are evaluated. The project implements sustainable mobility pilots (provincial measures to promote sustainable mobility and emission reductions, school and study trips, commuting, goods logistics), operating models are developed based on the knowledge and experience gained, tools and action suggestions. The results are presented to the decision-makers of the cities and municipalities of the province, in support of the city of Lahti's climate program and the climate planning of the province's municipalities, as well as the locals for use by educational institutions and companies. In addition, the project produces communication material for the target groups: municipalities, municipal decision-makers, civil servants, educational institutions, private sector, provincial residents and other stakeholders.

Through the measures of the project, the energy efficiency measures and greenhouse emission reduction measures regarding road traffic of Päijät-Häme are promoted. As a result of the project, the capabilities of the municipalities to promote sustainable mobility have improved. Through the experiments made possible by the project more detailed information about the most effective sustainable mobility and transport solutions is received. As a result, regionally scalable sustainable transport and mobility operating models, tools and concrete proposals for measures, as well as communication materials for the use of the towns and municipalities of Päijät-Häme are available.

The results of the project will be used not only in the city of Lahti but also in other municipalities of Päijät-Häme and they are disseminated more widely at the national and international level. The personal data of those participating in the project's measures are collected and used for the aforementioned measures of the project and for organizing and communicating in the

project. To ensure the effectiveness of the project, the project actions and results are also communicated more widely through presentations, publications and articles in various channels such as in publications, social media and through networks. Personal data (e.g. given opinions/views/comments) are also used for project-related communication, however, in such a way that an individual respondent cannot be identified. In addition, details about the project's activities, such as meetings and workshops, will be communicated to the pilot organizations of the project, who have given their contact information to the project operators.

The project's activities create material that includes personal data. The material is analyzed during the project to examine the current state of sustainable mobility in Päijät-Häme municipalities, school and study trips, commuting and goods logistics in rural areas in association with the participating organizations. The project also aims to map out change promoting measures and their effects regarding sustainable mobility. The material gathered is also used in the evaluation of the effectiveness of the project and the measures taken.

The collected material will be anonymized by the end of the project. After the end of the project, the anonymized material is archived in the manner described below in this privacy notice. The anonymized material can be used during or after the project for research, publications, development and for teaching.

### ***What data are we collecting? / Contents of data file***

We collect and store the following information from people when registering for or participating in the project's events: name, organization, job title, phone number and email, special diet related to catering. Photography or video recording at the project's events will be announced upon arrival at the event. The person's separate consent is requested for the collection, storage and publication of photos and video material from which the person can be identified in connection with the operation of the project.

Screenshots are taken of the events organized remotely, which serve as a list of names, which we can use to verify the organization of the event to the project financier, if necessary. In the participating organizations (pilot companies and schools/educational institutes), the current status of sustainable mobility as well as the impact of the experiments carried out in the project and the changes in the activities related to them are evaluated with the help of surveys, interviews, observation and documentation of meetings and workshops. In addition, material can be collected from stakeholder groups, such as municipal organizations and political decision-makers or companies in the region, as well as associations and network operators. For this purpose, the survey and interview responses of the participants of the measures, observation material and the discussions of meetings and workshops are recorded, which include, among other things, the opinions/views/comments given. An audio recording and a transcribed version of the interviews will be recorded, if the interview is recorded. Separate consent is requested from the participating organization for photography and video recording in connection with the observations.

A more detailed description of the collected data by work package (responsible organization):

**Work package 1.** Tools and measures for monitoring and promotion of carbon neutrality and energy efficiency of transport and mobility (LAB)

From whom information is collected: Päijät-Häme municipalities (office holders and political decision-makers), residents (including summer residents), mobility and goods logistics service providers, city and charging infrastructure (operators linked to maintenance), associations and other network operators.

Find out and describe the most effective municipal-level measures/means needed for changes in the operating power and mode of sustainable passenger and freight transport/mobility: 1) to promote electronic transport (e.g. charging infrastructure), 2) to reduce private driving and its emissions (e.g. traffic pricing, speed limits, incentives) and 3) to increase the share of public/light transport modes.

In addition, information related to the emission effects of the measures is mapped.

**Work package 2.** Sustainable school and study trips pilot (City of Lahti)

Pilot sites are selected at the beginning of the work package. LAB University of Applied Sciences participates in this work package data collection for planning and production, but the city of Lahti carries out the data collection independently and does not share collected personal information directly with LAB. For use by the project anonymized and analyzed information is delivered, which is also stored with the projects research material.

From whom information is collected: Pupils, students, guardians, teachers and the school/educational institution workforce. The Sustainable School and Study Trips pilot explores measures with which sustainable mobility will be increased commuting to school and during the school day. A mobility plan for schools is created in this package to be implemented in schools and secondary schools and educational institutions in Päijät-Häme.

### **Work package 3. Commuting mobility pilots (LAB)**

Commuting mobility pilots are implemented in two target organizations (companies) in Lahti, which want to develop sustainable commuting mobility.

From whom the information is collected: Two companies from Päijät-Häme, which have agreed to be pilots; their management and personnel.

The current state of commuting in the Päijät-Häme area and individual and organization-specific incentives for commuting will be investigated. The target organization-specific obstacles and opportunities to promote sustainable commuting are mapped through a survey directed at employees, organization-specific interviews and workplace observation. The survey will be answered anonymously. Answers are treated completely confidentially, in a form that does not identify the person.

The pilot organization gets access to the analyzed results (without background information) from which the individual respondent cannot be identified. The results will be used for the development work related to the commuting mobility of the pilot organization, and based on it, development targets for commuting mobility will be recommended. In the pilot organizations, the most effective measures encouraging sustainable commuting and the so-called nudging methods are tested.

Information is produced for companies and municipalities about tested measures and their effectiveness, alternatives for sustainable commuting and 'getting involved', as well as for the development of public transport and sustainable mobility infrastructure and the identification of sustainable travel chains. We disseminate information to the municipalities and operators of Päijät-Häme, e.g. Through the Päijät-Häme climate working group and the Päijät-Häme circular economy group.

### **Work package 4. Goods logistics pilots (LAB)**

Low-emission and zero-emission distribution solutions and services are mapped and tested in the sparsely populated areas of Päijät-Häme.

From whom information is collected: Päijät-Häme municipalities (office holders and political decision-makers), residents (including summer residents), management and employees of the pilot companies and other logistics service providers, city- and charging infrastructure (operators linked to maintenance), associations and other network operators.

The project will map out the goods distribution needs / quantities of the sparsely populated areas of Päijät-Häme taking into account seasonal population changes in cottage municipalities (e.g. Asikkala, Sysmä) and locations and utilization rate of pick-up lockers in the sparsely populated areas. The project seeks to find low-emission and zero-emission distribution solutions suitable for sparsely populated areas to accelerate the transition to sustainable mobility in goods transport.

Pilot sites are selected at the beginning of the work package. A goods transport pilot will be implemented together 1–2 companies operating in Päijät-Häme. Through the pilots the project maps out the challenges of distribution, opportunities and conditions in the sparsely populated areas of Päijät-Häme. One possibility is to test the electrical distribution capacity in a sparsely populated area, the charging infrastructure requirements and location options, routing optimization and evaluating the emissions generated.

A report on the results of the experiments and proposals for effective measures will be drawn up for the municipalities of Päijät-Häme in order to promote a change in the driving power and

mode of transportation of goods distribution in the sparsely populated areas (charging infrastructure needs etc.).

**Work package 5.** Communication and implementation of results (City of Lahti (LAB supports actions))

The results and lessons learned from work packages 1–4 are implemented through communication and follow-up measures in within the city of Lahti, to other municipalities in Päijät-Häme and to various stakeholders and network operators.

From whom information is collected: Päijät-Häme municipalities (officials and political decision-makers), residents (also summer residents), logistics service providers, city and charging infrastructure (linked to maintenance actors), associations and other network actors, representatives of regional development organizations, and pilot companies' management and employees, pupils/students and guardians and others who participated in the pilot.

Based on the results of work package 1, municipal decision-makers and stakeholders will be involved in planning what kind of new mobility measures are sufficiently effective and feasible in our region in the coming years. An important target group are city and municipal councilors and board members, who ultimately decide what kind of actions will be implemented in Lahti and Päijät-Häme. Communication about why the change is necessary for sustainable mobility, what are the effects of possible measures on emissions, the economy, to well-being, health and the urban environment more broadly are provided for companies, schools and educational institutions and other stakeholders, such as associations. The point of view of each actor is also important in this change and how measures are implemented in stakeholder cooperation. We produce communication materials and publications for different goals and target groups (officials, decision-makers, residents, private sector, local municipalities and other stakeholders) taking into account work packages 1–4 based on experiences and results.

The work package collects event registrations and feedback, as well as feedback collected of the produced material.

Generally, photography or video recording at the project's events will be reported at the event upon arrival. To collect photographs and video material from which a person can be identified, the person's consent is requested separately for recording and publishing in connection with the operation of the project.

Screenshots are taken of events organized remotely, which serve as a list of names, which if necessary, we can certify the organization of the event to the project financier.

The project is funded by the Häme Centre for Economic Development, Transport and the Environment on a grant from the European Regional Development Fund. Data from the participating organizations is gathered to monitor effectiveness as per the rules of the financier.

### ***Why are we collecting data? / Legal basis of personal data processing***

The collection of personal data is based on the data subject's consent. This means that for example when registering to an event by the project the person gives the project permission to add their details to the participant list.

### ***From where do we collect data? / Data sources***

We collect personal data from the data subjects.

### **Data transfer and disclosure**

As a result of the project measures, personal data will be transferred or disclosed to the following outside parties/data processors:

- Event services such as Lyyti or Webropol -systems which help collect and handle event and workshop registrations. The project coordinator LAB, the partner City of Lahti and the service providers have agreed on the terms on the management of personal data.

- Survey data and feedback are gathered using a webform by an outside service provider (such as Webropol and Maptionnaire).
- Personal data such as name and contact information and survey and interview answers are updated and stored on the internal servers of the project partners or in OneDrive for Business and Microsoft Teams.
- Transcriptions meaning transferring voice files into written form is done using Microsoft Teams or an outside service provider that is committed to the safe handling of personal data as well as destroying the voice file after the transcription process.

Project personnel have access to the personal data in this register during the project. Access to the personal data containing direct identifying information such as interview recording and survey answers on a person level is restricted to a select number of individuals (at work package leaders and project partners LAB and City of Lahti)

The data gathered is related to the solutions of sustainable mobility in organizations (personnel, schools/institutions) as well as in transfer of goods.

The anonymized material can be used for research, publications, development and for teaching by the project organizations LAB and City of Lahti.

#### **Where will data be transferred? / Data transfer and disclosure beyond the EU or EEA**

The collected personal data will not be transferred beyond the EU or EEA.

#### **How is the data protected? / Security of the collected data**

The digital materials are stored by LAB University of Applied Sciences (project lead and coordinator) and the city of Lahti (partner) on secure servers and in services certified as secure.

Access to information is during the project only with the project staff.

When anonymized the material generated in the project is available for use in the development of sustainable mobility related research, teaching and development purposes based on the permission given by the participants.

In the analysis phase, direct identification data and such indirect identification data which are sufficient to identify the person are removed from the data. Anonymized material is archived in the implementers' secure servers. The interview material is archived in transcribed form, the interview recordings are deleted by the end of the project.

#### **For how long is the data stored? / Data storage**

The personal data of those participating in the project's measures will be kept for communication and contact purposes for the duration of the project from 1 January 2024 to 30 June 2026 (or until the project officially ends after a possible extension).

Project monitoring material such as participant lists and personal information forms are kept and archived in accordance with the funders' instructions for at least 5 years from the due date of the project's last installment.

The anonymized research material collected in the project will be stored for a maximum of 5 years after the end of the project from the due date of the last installment, after which the material is deleted.

LAB: Anonymized material is stored on the secure server of LAB University of Applied Sciences, K-file in the LABdata base on the station according to the process.

City of Lahti: The city does not have a network station in use. The materials are stored in the internal city channels. The storage of statistical data is not limited. Material containing genuine personal information is stored only for the time necessary for the project or procedure, after which they are destroyed.

### **What type of decision-making takes place? / Automated decision-making**

No automated decision-making takes place in the data processing.

### **Your rights / Rights of the data subject**

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15).
- b) Right to rectification of data (article 16).
- c) Right to erasure of data (article 17).
- d) Right to restriction of processing (article 18).
- e) Right to data portability to another data controller (article 20).

If the data subject wants to exercise these rights, the data subject is asked to contact the data control contact person named below.

### **Data filing system**

Name of data file: Sustainable Mobility Pilots in the Region of Päijät-Häme (KELPO)

Duration of project: 1.1.2024-30.6.2026

### **Collaborative data controllers**

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### **Contact person**

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### **Parties and division of duties in a collaborative project**

Sustainable Mobility Pilots in the Region of Päijät-Häme (KELPO) is a collaborative project lead and coordinated by LAB University of Applied Sciences together with partner City of Lahti.

Same rights and responsibilities apply to both parties involved in the project.

The parties have jointly agreed as to the gathering of research data. The data is handled and analyzed jointly as per the project plan and this privacy notice.

The project is funded by the Häme Centre for Economic Development, Transport and the Environment on a grant from the European Regional Development Fund.

### **Director in charge of the project**

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### **Researchers**

Project managers, specialists, coordinators, project workers and trainees and students possibly participating the project.

### **Data protection officers**

Name and position: Ilona Saarenpää, Legal Counsel  
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